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Hon. Stockwell Day
Minister of International Trade
Government of Canada
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Minister Day:

I am the Communications Director for the *Integrated Environmental Plant Management Association of Western Canada* (IEPMA). My position is a volunteer one (unpaid), and I have been retired for 4 ½ years. The reason I continue to work with the IEPMA is due to my increasing dismay with the trivialization, ignoring, and purposeful misinterpreting of science by environmentalist activists, as well as the total disregard for science and scientists from the Municipal to the Provincial level.

I have read – with great concern – of your promised support for the Province of Quebec’s position on the banning of 2,4-D in its fight against Dow Chemical (*National Post*, March 29/09).

Agencies of your own Government – namely Health Canada and the PMRA – have stated on numerous occasions that 2,4-D poses no unacceptable risks to the public. For example, in the *Re-evaluation Decision RVD2008-11* (May 16, 2008), it is stated:

Products containing 2,4-D do not pose unacceptable risks to human health or the environment. They also have value for lawn and turf, agriculture, forestry and industrial uses when used according to the label directions proposed in previous consultation documents.

From your statements, I would have to assume that you must consider the 350 qualified scientists of the PMRA incompetent and/or incapable of arriving at correct scientific findings.

The same conclusion on the safety of 2,4-D has been arrived at by the PMRA, the U.S Environmental Protection Agency, and almost all other members of the OECD. Perhaps we should save a great deal of money, and simply get rid of all those scientists, since it appears that the very Government that provides their pay cheques does not feel it worthwhile to listen to them, and instead would base a decision relying on ‘junk’ science. It should also be noted that recent re-evaluations have also been undertaken by the European Union, the U.S. EPA, New Zealand, and the World Health Organization – none of which classify 2,4-D as a human carcinogen. Are you suggesting that this multitude of scientists is wrong? Your position, at the very least, undermines the credibility of the PMRA, a highly and internationally respected Canadian agency.

I have also read through the Briefing Note “Potential NAFTA Challenge to Quebec’s Ban of 2,4-D Lawn Pesticides” (March 24/09) prepared by Ecojustice and other activist associations, and no doubt forwarded to you. As is the case in so many other activist documents, this one is replete with misleading and incorrect ‘facts.’ Again, all you have to do is run this document past the PMRA for their interpretation.

As you may be aware, there are also numerous misleading – or unscientific – studies with such a negative point of view, such as the Ontario College of Family Physicians’ Pesticide Literature Review (2004). This review has been used to support almost every proposed pesticide ban, from the Municipal to the Provincial (e.g., Ontario) level.

The information used by those like the OCFP has been cherry-picked by the physicians – not scientists – writing the report, and the report has been discounted by many scientists and government experts in this and other countries. Studies used are generally all epidemiological, and links to cancer and other diseases have been weak and not consistent from study to study. Toxicological studies do not confirm the epidemiological findings. By definition, epidemiology cannot find causes: they merely suggest correlations, and the basic tenet of epidemiology is that correlation does not mean causation. Studies must also be consistently reproducible before a finding can be found meaningful. At any rate, the OCFP study ignored or down-played other important epidemiological studies that did not conform to its premise of the dangers of pesticides (again, check with the PMRA).

2,4-D has been registered in our country since 1946, and is the third-most used herbicide in Canada. If there were health problems related to 2,4-D’s application, it would seem obvious that concrete proof – after over 60 years of use – would have surfaced by now, particularly when you realize that there have been thousands of studies, and numerous re-evaluations by both Health Canada and the U.S. EPA. This herbicide is probably the most studied pesticide in history.

I am not generally a supporter of large international conglomerates such as Dow. However, when a company follows all Provincial and Federal regulations, and when a chemical they produce is banned from use solely because of political considerations, what options are available? There are absolutely no *bona fide* scientific grounds upon which to ban 2,4-D. It is the Government of Quebec that has forced Dow into the position it now takes. When one side abides by all the governmental rules, while the other side does not, what other direction can be taken?

As the Minister of Trade, you should be supporting the right of businesses and industries to operate within the rules you set. It is easy to take a stance against what is viewed by many simply as “Big Business,” and more difficult to do the right thing in such situations.

It has been noted, by scientists and many others, that the numerous bans of pesticides, from the Municipal to the Provincial level, will have a negative effect upon the research and development of new and important pesticides. Why would a company spend hundreds of millions of dollars and up to 20 years for development in an uncertain market? One of the reasons we are able to enjoy the life that we now do is because agriculture no longer requires millions more labourers employed in the production of food, something that would be required if no pesticides were used. Pesticides have ensured us good crops and food at reasonable prices. The activists that are adamantly behind the ban of so-called ‘cosmetic’ pesticides have made it clear that they will

next be looking at the golf course industry and then agriculture itself. By supporting the ban of tested and proven products such as 2,4-D, you are helping the activists along this course.

Neither you nor the Government of Canada has to directly back Dow or any corporation in this situation. I am requesting, as a citizen of the Okanagan and a taxpayer of Canada, that my representatives and Government back science and not a political position. What I have outlined in this letter does not even touch upon a fraction of the scientific information that is easily available.

Any facts or science on the subject that you could possibly require can be obtained as easily as contacting your Government's own PMRA.

If you do believe that your position and that of Quebec's is based upon science, I would appreciate it if you could forward me links or directions as proof of this. I would like to know what information you have that is not available to Health Canada, the PMRA, the U.S. EPA, the UK Government, and many others. After being involved in the tree and lawn care profession for 30 years, and after many years of doing my own investigations on the effects of pesticides on human health, I have yet to discover *any* legitimate and reproducible scientific study that could possibly lead me to conclude that 2,4-D poses a risk to either the general public or to the applicators themselves. As the author Anatole France once said, "If fifty million people say a foolish thing, it is still a foolish thing."

I realize that the Conservative Party would like to increase its popularity in Quebec, but I firmly believe it is time that Government – at all levels – comes to the support of science without engaging in partisan politics. Recently, you stated that, "Despite scientific evidence that supports humane harvesting techniques, and testimony from Inuit communities as to the harmful effect of the proposed ban, the EU continues to push forward with a proposal that will damage the livelihood of coastal and northern Canadians and their families" (CBC News, April 3, 2009). Is science only fit to be used when it supports your political position? Do you not realize that the proliferation of pesticide bans is financially harmful to the thousands of applicators employed in the service industry?

It is time to do the right action for the right reasons. Eventually, I believe that the truth – as supported by *real* science – will become apparent to all involved. I would hope that thinking and intelligent people would want to be seen as having been on the right side.

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cc: Prime Minister Stephen Harper
Hon. Ron Cannan
Hon. Michael Ignatieff